

Woodstock Die Cast Inc. 555 Wheeler Street Woodstock, IL 60098 Telephone (815) 338-0700

Refer to: 11109500B - Mr Henry Co. Woodstock / Woodstock Die Casting

ILD 005471503

EPA Region 5 Records Ctr.

December 17, 1985

Mark A. Haney, Manager
Facilities Compliance Unit, Compliance Monitoring Section
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
Division of Land Pollution Control
2200 Churchill Road
Springfield, IL 62706

Dear Mr. Haney:

The following is the response to the August 30, 1985, inspection by Mr. Rick Peterson:

- 1. Fursuant to 35 Ill. Adm. Code 725.113(b), a waste analysis plan was on file at the time of inspection but was overlooked during the visit. (See Attachment "A").
- 2. Pursuant to 725.115(d), see attached inspection records as Attachment "B" which are currently on file, dating back to 1980.
- 3. Pursuant to 725.116(d) (2), see attached job descriptions as Attachment "C" and pursuant to 725.116(d) (4), see Attachment "C", Part C, for the current training schedule and training records (Attachment "D").
- 4. Under section 725.173, Operating Record, Paragraph I, under part B, "A description and the quantity of each hazardous waste received and the method(s) and date(s) of its treatment, storage or disposal at the facility as required by Appendix I"; Woodstock Die Cast Inc. does not receive hazardous materials for treatment, storage or disposal, therefore this does not apply.

Also pursuant to 725.173(2), Woodstock Die Cast Inc. is again not a disposal facility but a generator of waste acetone and methyl ethyl ketone and see Attachment "E" for location of waste in the facility. Woodstock Die Cast Inc. also is a generator of non-hazardous Waste Oil (#930778-20103029 as Attachment "F") and a generator of non-hazardous Industrial Wastewater Treatment Sludge (#782083-097025003 as Attachment "G").

--See Page #2--

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December 17, 1985 Page #2.

5. Pursuant to 725.173(5), the following records (as Attachments "H") have been re-instated commensing on September 1, 1985.

If you have any further questions, please contact me.

Sincerely,

Don R. Woodside

Manager of Technical Services

DRW/c

Attachments

cc: J. Beale

R. Bernstein

L. Bolton

J. Byers

K. Miller

H. Stern

III. General Waste Analysis (40 CFR 265.13)

- 1. A detailed chemical and physical analysis of hazardous waste generated (real and/or suspected) treated and stored has been performed as specified by 40 CFR 261. The test parameters and methods are shown on the following page (s). Commercial hazardous chemicals will not be tested.
- 2. The analysis shall be repeated as necessary to insure that it is accurate and up to date or when there is a reason to believe that the process or operation generating the hazardous waste has been changed.
- 3. The analysis will be repeated when the off site disposer notifies the plant environment coordinator that the analysis of hazardous waste received at his facility does not match the waste designated on the accompanying manifest or shipping paper.
- 4. A written waste analysis plan as follows has been developed to comply with 40 CFR 265.13A.
- 5. A permanent file of test results shall be maintained by the plant and/or division environmental coordinator.

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U714	Trypen blue
UZ17	Uncil materia
UZX	Liverage
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* The Agency included those trade names of which it was power; in amesion of a trade name does not imply that it is not hex. How. The footband is footband on it is not not in a feet of the power.

Appendix I—Representative Sampling Methods

The methods and equipment used for sampling waste materials will vary with the form and consistency of the waste materials to be sampled. Samples collected using the sampling protocols listed below, for sampling waste with properties similar to the indicated materials, will be considered by the Agency to be representative of the

Extrernely viscous liquid—ASTM Standard D14)-70 Crushed or powdered material— ASTM Standard D348-75 Soll or rock-like material—ASTM Standard D420-60 Soillike meterial—ASTM Standard D1452-65

My Ash-like meterial—ASTM Standard
D2234-76 [ASTM Standards are evailable
from ASTM 1916 Race St. Philadelphia.
PA 19100]

PA 19100]
(Conta nerized liquid wastes—"COLIWASA" described in "Test Methods for the Eve ustion of Solid Waste, Physical/ (Chemical Methods," 1U.S. Environmental Protection Agency, Office of Solid Waste, Washington, D.C. 20400. [Copies may be obtained from Solid Waste Information, U.S. Environmental Protection Agency, 25 W. St. Clair St., Cincinnett, Ohio 43203] idend waste in pita, ponda, lagoons, and similar reservoirs.—"Pond Sampler" described in "Test Methods for the Eva ustion of Solid Waste, Physical/ Chemical Methods."

This manual also contains additional information on application of these protocols.

Appendix II— EP Toxicity Test
Procedure

A. Extraction Procedure (EP)

- 1. A representative sample of the waste to be tested (minimum size 100 grams) should be obtained using the methods specified in Appendix I or any other methods capable of yielding a representative sample within the meaning of Part 260. [For detailed guidance on conducting the various aspects of the EP see "Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods," SW-848, U.S. Environmental Protection Agency Office of Solid Waste, Washington, D.C. 20460."]
- 2. The sample should be separated into its component liquid and solid phases using the method described in "Separation Procedure" below. If the solid residue solid nesidue solid nesidue solid nesidue solid nesidue solid nesidue solid nesidue that solid nesidue can be discarded and the operator should treat the liquid phase as the extract and proceed immediately to Step a
- 3. The solid material obtained from the Separation Procedure should be evaluated for its particle size. If the solid material has a surface area per gram of material equal to, or greater than, 3.1 cm² or passes through a 9.5 mm (0.375 inch) standard sieve, the operator should proceed to Step 4. If the surface area is smaller or the particle size larger than specified above, the solld material should be prepared for extraction by crushing, cutting or grinding the material so that it passes through a 9.5 mm (0.375 inch) sieve or, if the material is in a single piece, by subjecting the material to the "Structural Integrity Procedure" described below.
- 4. The solid material obtained in Step 3 should be weighed and placed in an extractor with 18 times its weight of deionized water. Do not allow the material to dry prior to weighing. For purposes of this test, an acceptable extractor is one which will impart sufficient agitation to the mixture to not only prevent stratification of the sample and extraction fluid but also insure that all sample surfaces are continously

- (lare weight of peak

brought into contact with well mixed extraction fluid.

- 5. After the solid material and deionized water are placed in the extractor, the operator should begin agitation and measure the pH of the solution in the extractor. If the pH is greater than 5.0, the pH of the solution should be decreased to 5.0 ± 0.2 by adding 0.5 N acetic acid. If the pH is equal to or less than 5.0, no acetic acid should be added. The pH of the solution should be monitored, as described below, during the course of the extraction and if the pH rises above 5.2. 0.5N acetic acid should be added to bring the pH down to 8.0 ± 0.2 . However, in no event shall the aggregate amount of acid added to the solution exceed 4 ml of acid per gram of solid. The mixture should be agituted for 24 hours and maintained at 20"-40" C (68"-104° F) during this time. It is recommended that the operator monitor and adjust the pH during the course of the extraction with a device such as the Type 45-A pH Controller manufactured by Chemtrix, Inc., Hillsboro, Oregon 97123 or its equivalent, in conjunction with a metering pump and reservoir of 0.5N acetic acid. If such a system is not available, the following manual procedure shall be employed:
- (a) A pH meter should be calibrated in accordance with the manufacturer's specifications.
- (b) The pH of the solution should be checked and, if necessary, 0.5N are the notice should be manually added to the extractor until the pH reaches 5.0 ± 0.2 . The pH of the solution should be adjusted at 15. 30 and 60 minute intervals, moving to the next longer interval if the pH does not have to be adjusted more than 0.5N pH units
- (c) The adjustment procedure should be continued for at least 6 bours.
- (d) If at the end of the 24-hour extraction period, the pH of the solution is not below 5.2 and the maximum amount of acid (4 ml per gram of solids) has not been added, the pH should be adjusted to 5.0 ± 0.2 and the extraction continued for an additional four hours, during which the pH should be adjusted at one hour intervals.
- 6. At the end of the 24 hour extraction period, deionized water should be added to the extractor in an amount determined by the following equation:

V = (20)(W) - 16(W) - A

V m in deionized water to be added W m weight in grams of solid charged to

extractor

A = ml of 0.5N acetic acid added during extraction

7. The material in the extractor should be separated into its component liquid and solid phases as described under "Separation Procedure."

8. The liquids resulting from Steps 2 and 7 should be combined. This

^{*}These methods are also described in "Samplere read Sampling Procedures for Hazardous Wasta (Streems," EPA 600/2-60-018, January 1960.

^{*}Copies may be obtained from Solid Waste Information, U.S. Environmental Protection Agency, 20 W. St. Clair Street, Cincinnati, Ohio 45268.

^{*}The percent solids is determined by drying the filter pad at 80° C until it reaches constant weight and then calculating the percent solids using the following equation:

combined liquid (or the waste itself if it has less than 1/2 percent solids, as noted in Step 2) is the extract and should be analyzed for the presence of any of the conteminants specified in Table 1 of § 251.24 using the Analytical Procedures the Ignated below.

Reparation Procedure

Equipment A filter holder, designed for filtration media having a nominal pore size of 0.45 micrometers and capable of applying a 5.3 kg/cm2 (75 psi) hydrostatic pressure to the solution being filtered shall be used. For mixtures containing nonabsorptive solids, where separation can be affected without imposir.g a 5.3 kg/cm⁴ pressure differential, vacuum filters employing a 0.45 mirrometers filter media can be used. (For further guidance on filtration equipment or procedures see "Test Mathods for Evaluating Solid Waste, Pt.ysicsi/Chemical Methods."] Procedure:

(i) Following manufacturer's directions, the filter unit should be assembled with a filter bed consisting of a 0.45 inicrometer filter membrane. For difficult or slow to filter mixtures a prefilter bed consisting of the following prefilters in increasing pore size (0.65 micrometer membrane, fine glass fiber prefilter, and coarse glass fiber prefilter, can be used.

(ii) The waste should be poured into the filtration unit.

(iii) The reservoir should be slowly pressurized until liquid begins to flow from the filtrate outlet at which point the pressure in the filter should be transculately lowered to 10-15 psig. Filtration should be continued until liquid flow casses.

(iv) The pressure should be increased stepwise in 20 psi increments to 75 psig and filtration continued until flow ceases or the pressurizing gas begins to exit from the filtrate outlet.

(v) The filter unit should be depressurized, the solid material removed and weighed and then transferred to the extraction apparatus, or, in the case of final filtration prior to analysis, discarded. Do not allow the

material retained on the filter pad to dry prior to weighing.

(vi) The liquid phase should be stored at 4°C for subsequent use in Step 8.

B. Structural Integrity Procedure

Equipment: A Structural Integrity
Tester having a 3.16 cm (1.25 in.)
diameter hammer weighing 0.33 kg (0.73 ibs.) and having a free fall of 18.34 cm (6 in.) shall be used. This device is available from Associated Design and Manufacturing Company. Alexandria.
VA., 22314, as Part No. 125, or it may be fabricated to meet the specifications shown in Figure 1.

Procedure:

1. The sample holder should be filled with the material to be tested. If the sample of waste is a large monolithic block, a portion should be cut from the block having the dimensions of a 3.3 cm (1.3 in.) diameter x 7.1 cm (2.8 in.) cylinder. For a fixated waste, samples may be cast in the form of a 3.3 cm (1.3 in.) diameter x 7.1 cm (2.8 in.) cylinder for purposes of conducting this test. In such cases, the waste may be allowed to cure for 30 days prior to further testing.

2. The sample holder should be placed into the Structural Integrity Tester, then the hammer should be raised to its maximum height and dropped. This should be repeated fifteen times.

3. The material should be removed from the sample holder, weighed, and transferred to the extraction apparatus for extraction.

Analytical Procedures for Analyzing
Extract Cantaminants

The test methods for analyzing the extract are as follows:

(1) For arsenic, barium, cadmium, chromium, lead, mercury, selenium or silver: "Methods for Analysis of Water and Wastes," Environmental Monitoring and Support Laboratory, Office of Research and Devalopment, U.S. Environmental Protection Agency, Cincinnati, Ohio 45268 (EPA-600/4-79-020, March 1979),

(2) For Endrin: Lindane;
Methoxychlor, Toxsphene; 2,4-D; 2,4,5-TP Silver: in "Methods for Benzidina, Chlorinated Organic Compounds, Pentachlorophenol and Pesticides in Water and Wastewater," September 1978, U.S. Environmental Protection Agency, Environmental Monitoring and Support Laboratory, Cincinnati, Ohio 42588.

as standardized in "Test Methods for the Evaluation of Solid Wasta, Physical/ Chemical Methods."

For all analyses, the method of standard addition shall be used for the quantification of species concentration.

This method is described in "Test Methods for the Evaluation of Solid Waste." (It is also described in "Methods for Analysis of Water and Wastes.")

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I This procedure is intended to result in separation of the "free" liquid portion of the waste from any solid matter baving a particle size >0 45vm. If the sample will not filter, various other reparation techniques can be used to aid in the filtration. As described above, pressure filtration is employed to speed up the filtration process. This fore rot alter the nature of the separation. If liquid does not separate during filtration, the waste our be centrifused. If separation occurs during centrifugation the liquid portion (centrifugate) is filtered through the 0.48um filter prior to becoming mixed with the liquid portion of the weste obtained from the initial filtration. Any material that will not pass through the filter after centrifugation is executioned a solid and is extracted.

Plant Woodstock

Date November 19, 1980

R.C.R.A. Waste Analysis Plan

All suspected wastes will be tested for all presently applicable R.C.R.A. and N.P.D.E.S. Permit Parameters.

The test will be conducted in accordance with this procedure, outlined in 40 CFR 261 appendix II and III sampling will be done in accordance with 40 CFR 261 appendix I.

The material as listed for reoccuring hazardous waste is attached.

Any other suspected hazardous waste for disposal will be analyzed and entered in this list as generated.

WOODSTOCK DIE CASTING

HAZARDOUS WASTE ANALYSIS LIST

1. Final waste treatment sludge

Material	Total (PPM)	Leach (PPM)
Cn	0.0	0.0
Ag	0.0	0.0
As	0.0	0.0
Ba	2.8	0.0
Cd	0.0	0.0
Cr	1900.0	0.2
Cu	4700.0	0.0
Hg	0.0	0.0 (0.1 ppb)
Ni	14000.0	2.1
РЬ	0.1	0.0
Se	0.0	0.0
Zn	4800.0	0.3

% Solids - 23.59%

Ash Content 22.5%

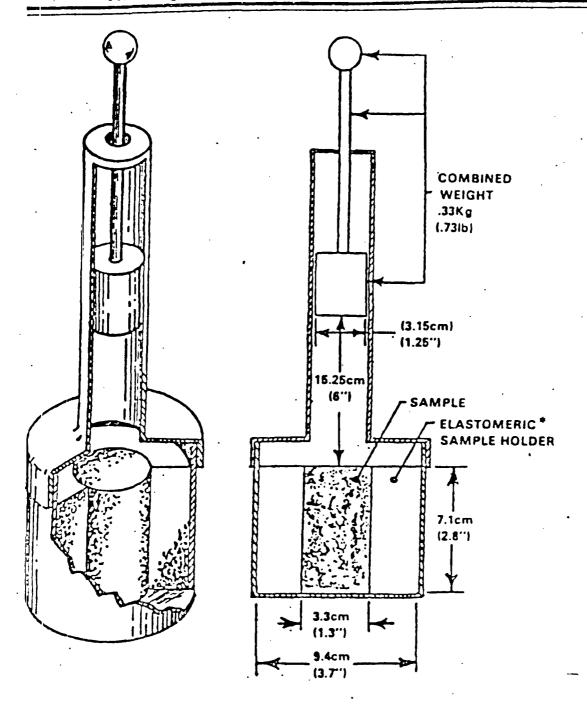
Flash Point 200°F

Compostion - inorganic

- Filter residue Cyanide waste in drums
 - % = 1000 as sodium cyanide .3%
 - % as sodium copper cyanide 1.8%
 - % as copper from sodium copper cyanide 1.5%
 - % active waste 20%
 - % inert material 80%
- 3. Cyanide destruction residuals
 - % as cyanide 40ppm
- 4. Spent solvents (ignitable)
 - a. mask wash solvents
 - b. waste paint thinner
- 5. Tramp oils from die cast operations

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*ELASTOMERIC SAMPLE HOLDER FABRICATED OF MATERIAL FIRM ENOUGH TO SUPPORT THE SAMPLE

Figure 1 COMPACTION TESTER

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- IX TROUBLE Chrome Recovery MOODSTOCK DIE CASTING DIVISION - ELTRA CORPORATION MONTH OF SEPT Demineral Acid Soda Ash DATE TIME Misd 85 OF. COMMENTS DAY System 2 V 3 1 L L-1 1985 6 138 7 \bigcirc 8 $\overline{}$ 16 20 21 22 23 M 27 V 28

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LIOKAY - X TROUBLE Chlorinator WOODSTOCK DIE CASTING DIVISION - ELTRA CORPORATION MONTH OF JEPT C1₂ Cy1 COMMENTS Chlorine Caustic TIME Transfer | Circ. OF. Pumps Pumps System Pumps pH DAY System Misc 2 W 5 6 <u>දැන</u> M Lil W v. V V 1 13 15 <u>(</u>--7 ک ر. \subset 50 <u>_</u> 21 22 23 24 25 27 28 29

2.10 PERSONNEL AND TRAINING

A. Job Titles and Descriptions

The following is a list of titles and job descriptions as pertains to the storage, treatment, and transportion of hazardous waste, and does not necessarily encompass the full scope of assigned responsibilities.

1. Manager, Technical Services

- a. Oversees general administration of the hazardous waste program.
- b. Selects the personnel assigned to the hazardous waste program.
- c. Directs appropriate training in hazardous waste management.
- d. Acts as the liaison between the facility and state and/or federal agencies involved with hazardous waste.
- e. Assumes the responsibilities of primary emergency coordinator.

2. Facilities Coordinator

- a. Supervises the pretreatment, storage, and transportation of hazardous waste.
- b. Assumes the responsibilities of emergency coordinator.

3. Alternate Facilities Coordinator

- a. Supervises the pretreatment, storage, and transportation of hazardous waste.
- b. Assumes the responsibilities of emergency coordinator.

4. Chemical Tank, Maintenance

- a. Operates the effluent pretreatment system.
- b. Maintains mechanical and electrical equipment associated with the pretreatment, storage, and transportation of hazardous waste.

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- .c. Maintains proper chemical mixtures and levels in the pretreatment system holding tanks.
 - d. Transports hazardous waste on site.
 - e. Prepares hazardous waste for off-site transportation and disposal.
 - f. Implements the appropriate emergency procedures as directed by the designated emergency coordinator.
 - g. Assists in the cleanup of hazardous waste spills.
 - h. Maintains emergency response equipment in usable condition.
 - i. Collects waste solutions from production equipment during cleaning and other maintenance operations.
- 5. Materials Handler
 - a. Transports hazardous waste on site from collection areas to storage or treatment areas.
- B. Hazardous Waste Personnel Roster

See Table 2-3 for current personnel assignments.

- C. Training Schedule
- 1. Personnel involved in the hazardous waste program who are presently employed shall complete adequate classroom on-the-job training in hazardous waste management commensurate with their level of responsibility on or before February 1, 1986.
- 2. Personnel involved in the hazardous waste program who are employed on or after November 30, 1985 shall complete adequate classroom or on-the-job training in hazardous waste management commensurate with their level of responsibility within six (6) months following employment.
- 3. Review sessions shall be held as deemed necessary by the Facilities Manager, or at least annually, or whenever any part of the hazardous waste program fails during an emergency condition, or whenever major process or procedural changes are instituted.

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The name of

TABLE 2-3

HAZARDOUS WASTE PROGRAM

PERSONNEL ROSTER AS OF DECEMBER 10, 1985

- A. Manager, Technical Services

 Don Woodside
- B. Emergency Coordinator

 Don Woodside

.

- C. Alternate Emergency Coordinator

 Preston Yeoman
- D. Machining Supervisor
 Frank Branham
- E. Plating Supervisor

 Eugene Cavin
 Robert McCabe
- F. Paint Shop Supervisor
 Ron Hyde

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- D. Contents of the Training Program
- 1. Each person involved with hazardous waste will receive adequate instruction as determined by the Facilities Manager to complete the duties and responsibilities of the work assignments.
- 2. The training may consist of a combination of on-the-job training and classroom instruction.
- 3. The training will include all aspects of the written hazardous waste program, and in particular, The Preparedness and Prevention Plan and The Contingency Plan.
- 4. The following procedures will be reviewed:
 - Using, inspecting, and repairing all emergency equipment.
 - Key parameters for automatic waste feed cut-off.
 - Communications and alarm systems.
 - Response to emergency conditions.
 - Shutdown of hazardous waste operations.
 - Waste collection procedures and drum handling.
- 5. A log will be maintained of all hazardous waste training activities; a copy of the Training Log is attached.

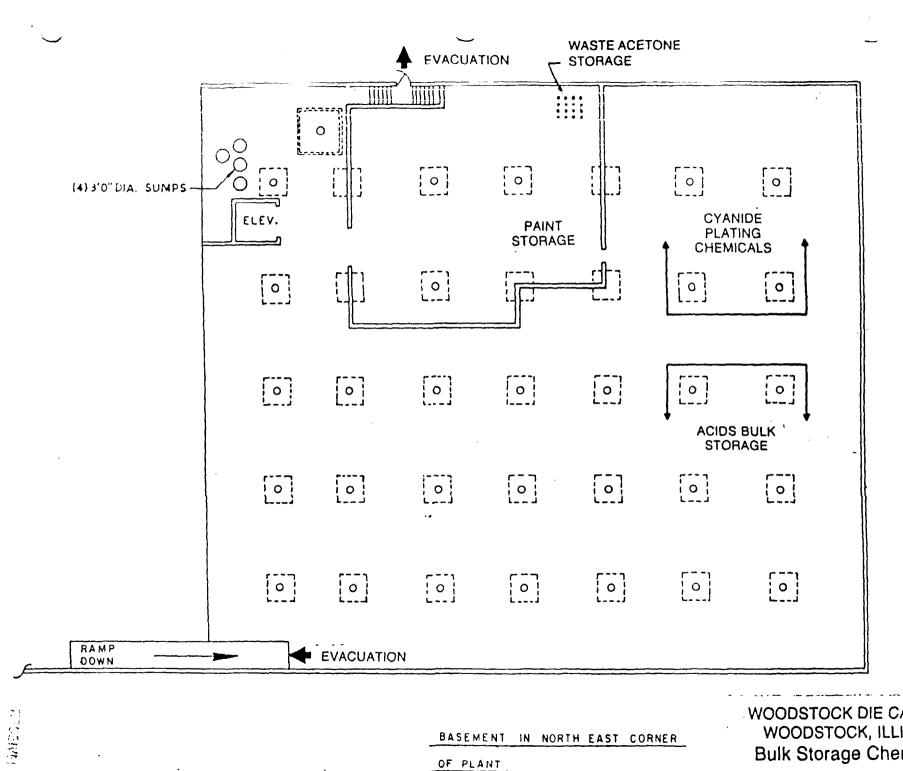
HAZARDOUS WASTE MANAGEMENT PROGRAM PERSONNEL TRAINING RECORD

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SUBJECT	FORMAT/INSTRUCTOR	DATE	COMPLETED									

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HAZARDOUS WASTE MANAGE IT PROGRAM PERSONNEL TRAINING SUMMARY

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BASEMENT IN NORTH EAST CORNER

OF PLANT

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WOODSTOCK DIE CASTING WOODSTOCK, ILLINOIS **Bulk Storage Chemicals**



Illinois Environmental Protection Agency 2200 Churchill Road Springfield, IL 62706

217/782-0702

DECEMBER 20, 1988 AASTE ISTREAM NUMBER

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CHARLES KULLASES

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THIS PERKIT IS GREATED SUBJECT TO THE ATTACHED STENDARD CONDUCTIONS.

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DISPUSITION OF MOSTER

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ATTENTION: JACKWEHUROW

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WOODSTOCK DIE CASTING

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Illinois Environmental Protection Agency • 2200 Churchill Road, Springfield, IL 62706

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PERMIT EXPIRES:

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666 DUNDEE RD-SUITE 1502 MORTHBROOK

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RESTON-OFFICE COURT

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ATTENTION: MICHAEL GAUDIELLO

TEPA GENERATOR NO.: 1110950003

WASTE GENERATOR:

ROODSTOCK DIE CASTING 555 WHEELFR ST

WHODSTOCK

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SPECIAL CONDITIONS:

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